

Exhibit B

THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

DAVID SCOTT, JEREMY CERDA, OSMAN
AK, MERUDH PATEL, GREGORY HARDY,
and LARRY WILLIAMS,

No. 19 Civ. 1075
(Korman, J.)
(Kuo, M.J.)

Plaintiff,

VIDEOCONFERENCE
DEPOSITION OF:
ANDRE MATEVOUSIAN

vs.

FORMER WARDEN HERMAN QUAY,
FACILITIES MANGER JOHN MAFFEO,
and THE UNITED STATES OF AMERICA,
Defendants.

TRANSCRIPT of the testimony of ANDRE
MATEVOUSIAN in the above-entitled matter, as taken by
and before CELESTE A. GALBO, a Certified Court
Reporter and Notary Public of the State of New
Jersey, held via Zoom remote videoconferencing
software, on August 6, 2021, commencing at 10:02 a.m.

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1 that list to Dr. Ballom, the issues that pertained to
2 medical or mental health concerns, and she followed
3 up on all of those issues and I reported back the
4 findings to Ms. von Dornum.

5 Q. I see. Did Dr. Ballom as part of your
6 review team conducted any quantitative analysis about
7 how many appointments were -- occurred during the
8 blackout?

9 Let me ask it in a simpler way. Did
10 the after action review team, did you ever determine
11 how many people received medical care during the
12 blackout?

13 A. I believe there is -- I believe there
14 is a reference to sick call requests between February
15 8th and 12th where she noted there were 219
16 individuals that requested appointments.

17 Q. Right. And so do you have the -- did
18 the After Action Report team get access to the
19 similar number of sick call requests between January
20 27 and February 3rd?

21 A. I don't recall what her findings were.
22 That's something that you can -- that she'd be better
23 suited to answer.

24 Q. Okay. Do you know if Dr. Ballom or any
25 members of the after action review team were able to

1 review any copies of the sick call requests that were
2 made during the blackout week?

3 A. I believe Dr. Ballom did review sick
4 call requests. I believe they were primarily -- I
5 believe all of them were handwritten or some of them
6 were handwritten, some were not available but she did
7 mention that during that time frame that she did
8 review some of the sick call slips.

9 Q. And those were ones that had been
10 handwritten by people and she was able to see those?

11 A. I believe at the time of the loss of
12 electricity, the computer terminals in which the
13 inmates utilized to sign up for sick calls were
14 affected by the power outage. So the staff at
15 Brooklyn instructed the inmates that they would have
16 to write their sick call requests on a sheet of paper
17 and turn them in on a daily basis.

18 Q. Okay. And it's your understanding that
19 Dr. Ballom had an opportunity to review some of those
20 sick call requests?

21 A. That's my recollection but as I
22 mentioned earlier, it's probably a better question
23 for her to answer.

24 Q. Okay. With respect to this piece of
25 Dr. Ballom's section of the report on page 25 that